

BLOOMFIELD LAW GROUP, INC.

A Professional Corporation

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Attorney for Plaintiff Nader Shaterian

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NADER SHATERIAN,

Plaintiff,

vs.

WELLS FARGO BANK, NATIONAL
ASSOCIATION; CAL-WESTERN
RECONVEYANCE CORPORATION;
and DOES 1-50, Inclusive

Defendants.

CASE NO. C 11-00920 SC

**STIPULATION AND FORM OF
~~PROPOSED~~ ORDER FOR CONTINUANCE
OF OPPOSITION DUE DATE ON
NOTICED MOTIONS SCHEDULED FOR
JUNE 10, 2011 FROM MAY 13, 2011 TO
MAY 18, 2011**

Date: June 10, 2011

Time: 10:00 a.m.

Courtroom: 1, 17th Floor

Judge: Honorable Samuel Conti

Plaintiff's counsel has requested a five day postponement of the presently set due date for pleadings herein otherwise due on May 13, 2011 from May 13, 2011 to May 18, 2011. The proposed reset date is still earlier than the opposition date normally flowing from the June 10, 2011 hearing date. There was by previous Stipulation and Order, dated April 22, 2011, [Dkt. No. 23], a continuance of the hearing dates, from the originally scheduled date of May 13, 2010 to June 10, 2011, of Plaintiff Nadar Shaterian's Motion (Amended) for a Preliminary Injunction (Dkt. Nos. 16 & 20); Plaintiff's Motion for Remand (Dkt. No. 14), and Defendant Wells Fargo Bank, N.A.'s Motion to Strike (Dkt. No. 10) and Defendant Wells Fargo Bank, N.A.'s Motion to Dismiss (Dkt No. 9) and a stipulated new briefing schedule. Pursuant to that Stipulation and Order, the parties agreed to a due date for

opposition (to all four motions) of May 13, 2011, which is 28 days prior to the date of the scheduled hearing and 7 days earlier than the 21 days required by Rule 7-3(b). (The due date for any reply papers is May 27, 2011 – in conformity with Rule 703(c). and is not being changed). At the request of plaintiff's counsel, the attorneys for all of the defendants have agreed that the due date for filing and service of opposition to all four motions shall be moved from Friday, May 13, 2011 to Wednesday, May 18, 2011 (which new date is 23 days prior to the date of the hearing and still in excess of the 21 days required by Rule 7-3(b)). There is no requested change to the due date for filing and service of any reply papers, which is and remains May 27, 2011.

STIPULATION

Plaintiff Nader Shaterian ("Plaintiff") and Defendants Wells Fargo Bank, N.A. and Cal-Western Reconveyance Corporation, (collectively, "Defendants"), by and through their respective counsel, hereby stipulate and request this Court to re-schedule the date by which any opposition to (1) Plaintiff's Motion to Remand [*Dkt. No. 14*], (2) Defendant's Motion to Dismiss [*Dkt. No. 9*], (3) Defendant's Motion to Strike [*Dkt. No. 10*], and (4) Plaintiff's (Amended) Motion for Preliminary Injunction [*Dkt. No. 16 & 20*] to Wednesday, May 18, 2011 (which date is 2 days earlier than the opposition due date under Local Rule 7-3(a)). Any reply papers must be filed and served no later than May 27, 2011 (pursuant to Local Rule 7-3(c) and previous Stipulation and Order).

Dated: May 13, 2011

BLOOMFIELD LAW GROUP, INC.
A Professional Corporation
By: /s/ Neil Jon Bloomfield
Neil Jon Bloomfield
Attorneys for Plaintiff Nader Shaterian

ANGLIN, FLEWELLING, RASMUSSEN,
CAMPBELL & TRYTTEN LLP
By: /s/ Viddell Lee Heard
Viddell Lee Heard
Attorneys for Defendant Wells Fargo
Bank, National Association

WRIGHT, FINLAY & ZAK, LLP
By: /s/ Nicole K. Neff
Nicole K. Neff, Esq.
Attorneys for Defendant Cal-Western
Reconveyance Corporation

DECLARATION OF CONSENT

Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the above-listed counsel for Defendants Wells Fargo Bank, N.A. and Cal-Western Reconveyance Corporation

Dated: May 13, 2011

/s/ Neil Jon Bloomfield
Neil Jon Bloomfield

(Proposed) **ORDER**

PURSUANT TO STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the date by which opposition to (1) Plaintiff's Motion to Remand [*Dkt. No. 14*], (2) Defendant's Motion to Dismiss [*Dkt. No. 9*], (3) Defendant's Motion to Strike [*Dkt. No. 10*], and (4) Plaintiff's Amended Motion for Preliminary Injunction [*Dkt. No. 16& 20*] shall be filed and served is extended from May 13, 2011 to May 18, 2011.

Dated: May 18, 2011

